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Attorneys for Debtor
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Hearing date: May 5, 2011
Hearing time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

Case No.: 10-13682

NORTRONICS, CORP.

In Proceeding for
Reorganization Under
Chapter 11

Debtor and Debtor in Possession

-----x

NOTICE OF HEARING

PLEASE TAKE NOTICE, that, upon the Motion of the Debtor for an Order extending time to obtain of its plan of reorganization (the “Motion”) dated April 21, 2011, the Debtor will move at a hearing to be held before the Hon. Sean H. Lane at the United States Bankruptcy Court, SDNY, Alexander Hamilton Customs House, One Bowling Green, New York, NY 10004 on May 5, 2011 at 10:00 a.m. of said day, or as soon thereafter as counsel can be heard for an Order extending the Debtor’s time to file its plan of reorganization.

PLEASE TAKE FURTHER NOTICE that responsive papers, if any, shall be filed with the Court in compliance with the Court’s electronic filing system and served upon Tanya P. Dwyer, Esq. at Dwyer & Associates LLC, 11 Broadway, Suite 615, New York, NY, 10004 and the Office of the United States Trustee, attn: Nazar Khodorovsky, Esq., Southern District of New York, 33 Whitehall Street, 21st. Floor, New York, NY 10004;

with a courtesy copy delivered to the Hon. Judge Sean H. Lane so as to be received no later than the date and time of the Hearing.

The Hearing may be further adjourned from time to time without further announcement other than an announcement at the Hearing.

Dated: April 21, 2011
New York, New York

Respectfully submitted,

/s/ Tanya P. Dwyer, Esq.

Tanya P. Dwyer
DWYER & ASSOCIATES LLC
Attorneys for Debtor
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MOTION TO EXTEND TIME FOR
FILING CHAPTER 11 PLAN

TO: THE HONORABLE SEAN H. LANE, UNITED STATES BANKRUPTCY
JUDGE:

Nortronics, Corp. (the “Debtor”), by its attorney Dwyer & Associates, LLC,
respectfully requests that the Court extend its time to submit its plan of reorganization
(the “Motion”), and represents and states as follows:

BACKGROUND AND APPLICABLE LAW

1. On July 12, 2010, (the “Filing Date), the Debtor, as a “small business debtor”
within the meaning of section 101(51D) of the Bankruptcy Code (the “Code”)
filed with this Court a voluntary petition under chapter 11 of the Bankruptcy
Code. As a small business debtor, the Debtor is subject to the provisions of the
Code that are applicable in a “small business case.” See section 101 (51C) of the
Code.

2. The Debtor has continued in the possession of its assets and the operation of its business as a debtor-in-possession. No Creditors' Committee has been appointed in the case.
3. Section 1121 (e)(2) of the Code requires that the Debtor file its "plan and a disclosure statement (if any) ... not later than 300 days after the date of the filing of the order for relief." The Debtor has not yet filed a plan of reorganization (the "Plan") and an accompanying disclosure statement.
4. Under section 1121 (e)(3)(A) of the Code, the aforementioned deadline may be extended only if:
 - (A) the debtor, after providing notice to parties in interest (including the United States trustee), demonstrates by a preponderance of the evidence that it is more likely than not that the court will confirm a plan within a reasonable period of time;
 - (B) a new deadline is imposed at the time the extension is granted; and
 - (C) the order extending time is signed before the existing deadline has expired.

The 300-day period to file the Plan presently expires on May 9, 2011.

5. By this Motion, and for the reasons set forth below, the Debtor respectfully requests that the Court enter an Order extending the Debtor's time to file the Plan (as it may be amended) to December 31, 2011, and that such Order be signed on or before May 5, 2011.

GROUND FOR RELIEF

6. As this Court knows, the Debtor sought relief under chapter 11 because it has a realistic expectation of reorganizing its business.

7. Due to recent developments in Debtor's operations, Debtor has over \$295,000 in existing bids and contracts that are due to be paid after the current date of confirmation. Specifically, the Debtor is scheduled to sign a contract to perform work on the Brooklyn Bridge that is worth \$229,000; it has two government bids currently pending with the Metropolitan Transportation Authority (the "MTA") that is worth \$69,000; and a current contract with Elmhurst Hospital that it has won in the past.
8. Furthermore, the Debtor's service business has picked up by 25% in April 2011 compared to March 2011 because construction season has begun. The Debtor has reason to believe that it will win a several government contracts in the next two quarters to supply it with cash to fund the plan.
9. To satisfy its burden of proof under section 1121 (e)(3), the Debtor intends to introduce evidence demonstrating that it is more likely than not to confirm a plan within a reasonable time. In considering what a "reasonable time" is in this case, the Debtor asks the Court to recognize that the Debtor cannot compel its creditors to pay without incurring significant debt itself in the form of legal fees and the Debtor does not expect that any creditor will object to the relief requested in the motion. It is for these reasons that the Debtor has requested an extension to June 30, 2011 to submit its Plan.¹

NOTICE

10. In compliance with section 1121(e)(3) of the Code, the Debtor is providing (a) a copy of this Motion, together with Notice of Hearing thereon (the "Notice"), to

¹ The Debtor hopes to submit the Plan well before June 30, 2011 but, at the same time, reserves the right to seek a further extension of its time.

the United States Trustee, and all parties that have filed an appearance in the case and (b) a copy of the Notice only to all creditors. The Notices recites that a copy of the Motion may be obtained by contacting the undersigned counsel in writing.

11. Wherefore, the Debtor respectfully requests that the Court (a) enter an order extending the Debtors time to submit the Plan (as same my be amended) to June 30, 2011 (the “Order”), (b) sign the Order on or prior to May 5, 2011, and (c) grant such other and further relief as may be necessary or appropriate.

Dated: New York, New York
April 21, 2011

/s/ Tanya P. Dwyer
Tanya P. Dwyer, Esq. (TD2845)
Dwyer & Associates LLC
Attorneys for the Debtors
11 Broadway, Suite 615
New York, NY 10004
(212) 518-3663

CERTIFICATE OF SERVICE

I hereby certify that, on April 21, 2011, I caused a copy of the Notice of Motion by Debtor to extend Time to File Plan of Reorganization Pursuant to Sections 1129(e) and 1121(e)(3), to be served upon all known creditors, the United States Trustee and any party filing notice of appearance in the case, by first class mail, postage prepaid, addressed to their respective addresses set forth on the attached service list.

I further certify that, on April 21, 2011, I caused a copy of the Motion for the foregoing relief to be served by first class mail, postage prepaid to the United States Trustee at their respective addresses as follows:

Nazar Khodorovsky
Office of the U.S. Trustee
33 Whitehall Street, 21st Floor
New York, NY 10004

Dated: New York, New York
April 21, 2011

/s/ Tanya P. Dwyer
Tanya P. Dwyer, Esq. (TD2845)
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